

Filed

3/30/22

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

DEPUTY

TANGALA CARTER,

Plaintiff,

v.

CALIFORNIA GRILL, LLC d/b/a
FOXY'S CABARET,

Defendant.

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1:19-CV-588-RP

VERDICT FORM

QUESTION NO. 1

Has Plaintiff Carter proved that California Grill, through the actions of Taylor Ratliff, Ashley Weaver and/or Erica Nobles, subjected Plaintiff Carter to a racially hostile work environment?

Answer "Yes" or "No":

Answer: Yes

If your answer to Question 1 is "yes," proceed to Question 2. If your answer is "no," skip to Question 4.

QUESTION NO. 2

Did Defendant California Grill know, or in the exercise of reasonable care should Defendant California Grill have known, that Plaintiff Carter was being harassed on the basis of her race?

Answer "Yes" or "No":

Answer: Yes

If your answer to Question 2 is "yes," proceed to Question 3. If your answer is "no," skip to Question 4.

QUESTION NO. 3

Did Defendant California Grill fail to take prompt remedial action?

Answer "Yes" or "No":

Answer: yes

QUESTION NO. 4

Was Plaintiff Carter's opposition of racial discrimination by Defendant California Grill's employees, if any, protected activity?

Answer "Yes" or "No":

Answer: yes

If your answer to Question 4 is "yes," proceed to Question 5. If your answer is "no," skip to Question 7.

QUESTION NO. 5

Did Defendant California Grill take adverse employment action against Plaintiff Carter by reducing her hours and limiting her ability to serve customers?

Answer "Yes" or "No":

Answer: No

If your answer to Question 5 is "yes," proceed to Question 6. If your answer is "no," skip to Question 7.

QUESTION NO. 6

Do you find that Plaintiff Carter would not have had her hours reduced and her ability to serve customers limited but for her opposition to racial discrimination?

Answer "Yes" or "No":

Answer: /

QUESTION NO. 7

Was Plaintiff Tangala Carter constructively discharged?

Answer "Yes" or "No":

Answer: No

If you answered "yes" to any of Questions 3, 6, or 7, proceed to Question 8. If you answered "no" to all three, stop here.

